

DEPARTMENT OF TRANSPORTATION

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Governor's Office of Planning & Research

Nov 24 2020

STATE CLEARINGHOUSE

November 24, 2020

11-IMP-78

PM 41.06

Polaris Glamis Specific Plan
NOP/DEIR/SCH# 2020100348

Ms. Patricia Valenzuela
Planner IV
County of Imperial
Community Development Department
Planning and Zoning Division
1275 West Main Street
El Centro, CA 92243

Dear Ms. Valenzuela:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review of the Polaris Glamis Specific Plan Notice of Preparation (NOP) Draft Environmental Impact Report (DEIR) (SCH# 2020100348) and for the Draft Initial Study & Environmental Analysis on this project located in Glamis near State Route 78 (SR-78) in Imperial County. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with Caltrans' mission and state planning priorities.

Caltrans has the following comments:

Environmental

Caltrans appreciates the opportunity to comment on this NOP for the Polaris Glamis Specific Plan DEIR. The analysis presented may impact on Caltrans Right-of-Way (R/W) in the future. Future projects should be based upon the changes enacted from the Program EIR have elements and/or mitigation measures change to effect Caltrans R/W, Caltrans would welcome the

opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA) and to the continued coordination of our efforts.

Traffic Engineering and Analysis

- In accordance with Senate Bill (SB) 743 public agencies are required to use Vehicle Miles Traveled (VMT) to evaluate transportation impacts associated with development. Please provide a traffic impact study using the Caltrans-Vehicles Miles Traveled-Focused-Transportation Impact Study Guide -May 20, 2020. Provide a Vehicle Miles Traveled (VMT) analysis for the Polaris Glamis Specific Plan Traffic Study. Caltrans guidance on VMT studies for local development has been released for use (Transportation Impact Study Guide, TISG). The TISG details how the Caltrans Local Development-Intergovernmental Review (LD-IGR) program reviews a land-use project's vehicle miles traveled. See <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>
- For additional guidance, Caltrans references the Governor's Office of Planning and Research (OPR) Senate Bill 743 based *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018) for guidance on the development of VMT based Transportation Impact Studies. Caltrans recommends use of OPR's significance thresholds for determination of transportation impacts from land use projects. OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA* is available online at <http://opr.ca.gov/ceqa/updates/sb-743/>.
- Any proposed intersection expansion or modification will require an Intersection Control Evaluation (ICE) report as required by the Caltrans Traffic Operations Policy Directive #13-02. Submit an ICE report for the proposed intersection at Glamis Main Street on Figure 8 of the Draft Study & Environmental Analysis of the Glamis Specific Plan dated October 2020.

Comments for the Glamis Specific Plan – Draft Initial Study & Environmental Analysis

Page 7 - Description of Project – There is a brief description of the proposed land uses listed. The report does not account for other land uses that are mentioned in the project trip generation. Please revise the project trip generation “Table A” (provided by Polaris’ Consultant) to include the below development which is mentioned and listed on page 7:

- a) Fuel station, rental facilities, entertainment and hospitality uses, sporting goods stores, adventure center, amusement facilities, movie theater, obstacle courses, fireworks and light display area and racetrack.

Page 43 - Section XVII Transportation/Traffic – Caltrans does not concur that the impacts from the Polaris development will result in Less Than Significant impacts. The full environmental process and determination of impacts under CEQA will describe the project impacts and mitigations.

Page 44 - Discussion c) Less than Significant Impact. Add sentences to mention the Intersection Control Evaluation (ICE) requirements in addition to the proposal of a signal at the intersection.

Comments for the Glamis Specific Plan – First Screen Check Draft EIR

Page 3-1 - Sections 1.0 and 2.0 appear to be missing.

Page 4-2 - Section 4.2 - Proposed Project Section – Paragraph 2 - “This designation is intended to accommodate a large variety of commercial uses that are generally supportive of OHV activities and provide for large scale events to be held both on private property as well as adjoining federal lands.” Does Bureau of Land Management (BLM) support large variety of commercial uses adjoining Federal lands?

Page 4-4 - Hospitality – “With an average annual attendance of 200,000 visitors to the Glamis area.” According to the Visitation Data provided by LLG Engineers, the annual attendance for 2019 was over 600,000 for this area.

Page 4-7 – Section 4.3 - Project Components – “In compliance with CEQA, only those components of the proposed Glamis Specific Plan that would have the

potential to result in potential environmental effects are addressed in this EIR." Impacts to the transportation network need to be addressed as well.

Page 4-8 - Section 4.3.3- Circulation Plan - Paragraph 1 stated "There are a total of 6 proximate vehicular access points to the project vicinity with a gateway feature on SR-78 (Figure 4-3)". The entire stretch for vehicular access west of the proposed signalized intersection will be required to have a fence installed along SR-78. Justify the need to have additional accesses if the proposed signalized Glamis Mainstreet intersection is not enough for Area 1. Each of these requested accesses will need to be evaluated as they could potentially create illegal crossings of SR-78.

Page 4-8 - Section 4.3.3- Circulation Plan - Paragraph 1 - "There are a total of 6 proximate vehicular access point to the project vicinity with a gateway feature on SR-78 (Figure 4-3)." Clarify the type of gateway and the installation location. Non-essential highway appurtenances like a gateway will need to be 52 feet from the edge of travel way.

Page 4-8 - Section 4.3.3- Circulation Plan - Paragraph 2 - "...To accommodate the anticipated vehicular traffic flow, the applicant has proposed a conceptual intersection plan with proposed cross-sections subject to final design and approval from Caltrans (Figure 4-4)." Any proposed intersection expansion or modification will require an Intersection Control Evaluation (ICE) report as required by the Caltrans Traffic Operations Policy Directive #13-02. Submit an ICE report for the proposed intersection at this intersection for review. Operations Policy Directive #13-02 can be provided upon request.

"The Glamis Specific Plan proposes a transportation concept showing the portion of SR-78 traversing through the project vicinity being expanded from two thru lanes with an ultimate R/W width of 40 feet to a total of five (5) lanes with an ultimate R/W width of 72 feet. The segment of SR-78, west of the proposed intersection would have three easterly lanes - one thru lane, one left turn lane and one right turn lane - and two westerly lanes with one thru lane and an acceleration lane terminating approximately 1,000 feet from the intersection. The segment of SR-78 east of the intersection is of a similar configuration of the western segment with the number of lanes in each direction reversed and the acceleration lane terminating approximately 600 feet from the intersection." This concept proposes a significant level of

expansion of the State Highway System, and close coordination with Caltrans will be required. Caltrans has made no determination on the proposed concepts.

Page 4-8 - Section 4.3.3- Circulation Plan - Paragraph 3 - All proposed accesses along SR-78 for the proposed development Area 1-8 will need to be improved to meet Caltrans latest driveway standards with acceleration and deceleration lane based on the proposed development phasing (safety).

Page 4-11 Circulation Plan - "The project vicinity includes the Sand Highway that runs parallel to SR-78 along the northwestern edge of Planning Area 1." Is there a plan for separating the "Sand Highway" from SR-78 using physical barriers such as K-rail, fencing, or other means?

Please specify location of signs and under whose authority signs will be posted.

Page 4-26 - Table 4-2 "Anticipated Land Use Changes Through 2051/2071. Please include the growth rate used for the proposed traffic ADT in the report. Also, include this future growth volume in the future project traffic trips scenario in the Traffic Impact Analysis (TIA).

Page 4-27 – Section 4.4 Project Phasing - "... the earliest construction beginning in late 2021. No uses would be opened prior to 2022 (opening year). The build-out year would be 2051 /2071." What are the phases of the project to be constructed between 2021 and 2051?

Design

1. The Project Development Procedures Manual (PDPM) Chapter 29 must be consulted regarding the requirements for Gateway Monuments.
2. In addition, above ground gateway monuments are considered fixed objects and must comply with the Highway Design Manual (HDM) standard for Index 309.1(2)(b) Clear Recovery Zone for Discretionary Fixed Objects and/or HDM Index 309.1(3) Minimum Horizontal Clearances.
3. The HDM should be consulted for the design of any proposed grade-separated structures and at-grade intersections.
4. Proposed utility lines (new or relocated) within the R/W should comply with the policies in the PDPM Chapter 17.

5. If a frontage road along SR-78 is to be included, consult the HDM for design standards, including barrier separation.
6. New access points along the right of way may need to be evaluated based on access controlled guidance.
7. If an access opening on SR-78 is being requested, Caltrans Design will need to evaluate the geometric proposal once the specific roadway access plans has been submitted. The Caltrans Design Branch will need to review and comment on the roadway access opening per the HDM.

Hydraulics

- 1) Provide a letter from the Floodplain Administrator stating that this project has no rise or a letter showing coordination with the Floodplain Administrator.
- 2) Per the draft IS/EA, Page 19, Figure 9 is insufficient:
 - a) Provide existing topographic information with labels (typically 0.1' contours in the desert areas).
 - b) Provide proposed topographic information with labels (typically 0.1' contours in the desert areas).
 - c) Both maps/exhibits must clearly show the drainage patterns along SR-78, which in the current figure is not visible at all.
- 3) Coordinate with Caltrans' Survey Branch to obtain Caltrans R/W and SR-78 stationing, centerline, and alignment name to be shown and labeled on all plans and maps containing SR-78.
- 4) Provide information on the maps/exhibits to show how the conceptual offsite drainage will cross the Ted Kipf Road along Sr-78. This is vital as additional runoff discharge coming from the culvert at northeast side of the site will have potential impact to the existing Caltrans drainage inlet located at the southwestern side of the project.
- 5) Hydrology and Hydraulics Study may be required to determine the effect of the proposed project to the existing drainage system in the area.

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Active Transportation

- US Bicycle Route System (USBRS) designates SR-78 as part of the “Southern Tier Route” in this area. Cyclists are present and use this road for regional and cross-country trips.
- As the Glamis Specific Plan develops and is implemented, consider how cyclists and off-highway vehicles may interact. Namely when off-highway vehicles take the shoulder of SR-78, where cyclists may be present.
- The document mentions “Urban hardscape (i.e., paved roads, curb and gutter, etc.) will be built in tandem with all proposed permanent structures.” Please specify the locations of sidewalks and bike lanes, and other complete streets elements.

If you have any questions, please contact Mark McCumsey, of the Caltrans LD-I GR Branch, at (619) 985-4957 or by e-mail sent to mark.mccumsey@dot.ca.gov.

Sincerely,

electronically signed by

MAURICE EATON, Branch Chief
Local Development and Intergovernmental Review Branch